

CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.
COUNSELLORS AT LAW

CHARLES C. CARELLA
JAN ALAN BRODY
JOHN M. AGNELLO
CHARLES M. CARELLA
JAMES E. CECCHI

JAMES D. CECCHI (1933-1995)
JOHN G. GILFILLAN III (1936-2008)
ELLIOT M. OLSTEIN (1939-2014)
BRENDAN T. BYRNE (1924-2018)

JAMES T. BYERS
DONALD F. MICELI
CARL R. WOODWARD, III
MELISSA E. FLAX
DAVID G. GILFILLAN
G. GLENNON TROUBLEFIELD
BRIAN H. FENLON
LINDSEY H. TAYLOR
CAROLINE F. BARTLETT
ZACHARY S. BOWER+
DONALD A. ECKLUND
CHRISTOPHER H. WESTRICK*
MICHAEL CROSS
STEPHEN R. DANEK
MICHAEL A. INNES

**5 BECKER FARM ROAD
ROSELAND, N.J. 07068-1739**
PHONE (973) 994-1700
FAX (973) 994-1744
www.carellabyrne.com

PETER G. STEWART
FRANCIS C. HAND
AVRAM S. EULE
JAMES A. O'BRIEN III
JOHN G. ESMERADO
STEVEN G. TYSON

OF COUNSEL

RAYMOND J. LILLIE
MEGAN A. NATALE
CHRISTOPHER J. BUGGY
JOHN P. PETROZZINO
GREGORY G. MAROTTA
KEVIN COOPER
MARYSSA P. GEIST
JORDAN M. STEELE**

July 16, 2021

*CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY
+MEMBER FL BAR ONLY
**MEMBER NY BAR ONLY

VIA ECF

The Honorable Edward S. Kiel
United States Magistrate Judge
U.S. Post Office & Courthouse Building
Newark, NJ 07101

RE: *In re Zytiga Litigation*
Civil Action No. 19-12107 (KM)(ESK)

Dear Judge Kiel:

We are Interim Liaison counsel for End Payor Class Plaintiffs in the above-captioned matter. Enclosed herewith is a proposed ESI protocol that has been agreed to by the Qui Tam and End Payor Plaintiffs and Defendants. If it is acceptable to the Court, kindly sign the protocol and have a "filed" copy returned to us via the Court's ECF system.

Thank you for your continued attention to this matter. If the Court has any questions, we are available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.

/s/ Lindsey H. Taylor

LINDSEY H. TAYLOR

cc: All Counsel (via ECF)